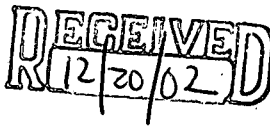


Siegfried



Siegfried (USA), Inc.
33 Industrial Park Road
Pennsville, NJ 08070
Phone (856) 678-3601
Fax (856) 678-4008

December 18, 2002

FedEx Tracking No.:
8384 0035 0087

Mr. Seth Ausubel
Remedial Project Manager
United States Environmental Protection Agency
Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Response to CERCLA RFI Regarding the Berry's Creek Study Area

Dear Mr. Ausubel:

Attached is the response to the EPA request referenced above.

Should you need to contact me regarding this submittal, my direct dial phone number is (856) 678-8836.

Sincerely,

Siegfried (USA), Inc.

A handwritten signature in cursive script, reading "Victor J. Giudice".

Victor J. Giudice
ESH Manager

Cc.: T. Strauss
C. Guerrette
S. Gerber
T. Read



CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Salem:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

Victor J. Giudice
NAME (print or type)

ESH Manager
TITLE (print or type)

Victor J. Giudice
SIGNATURE

Sworn to before me this eighteenth

day of December, 2002.

Deborah C. Holmes
Notary Public

DEBORAH C. HOLMES
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 24, 2003
ID # 2116020

Request for Information

1. Legal Name and mailing address of Siegfried (USA), Inc.

- a. Siegfried (USA), Inc.
33 Industrial Park Road
Pennsville, NJ 08070
- b. Legal status of Siegfried (USA) and state in which it was organized or formed.

Incorporated in New York on 1/1/28 as Ganes Chemical Works, Inc. Ganes re-incorporated on 5/23/89 in Delaware as Ganes Chemicals, Inc. On 1/1/02, Ganes changed its name to Siegfried (USA), Inc.

c. Names and addresses of:

- i. President:
Donald D. Bell
Siegfried (USA), Inc.
33 Industrial Park Road
Pennsville, NJ 08070
- ii. Chairman of the Board:
Dr. Bernard Siegfried
Siegfried Ltd.
1400
Zofingen, CH
- iii. Chief Executive Officer:
Douglas C. Gunthardt
Siegfried Ltd.
1400
Zofingen, CH

d. Subsidiary or affiliate of another corp. and relationships:

Siegfried (USA), Inc. is a wholly owned subsidiary of Siegfried Ltd.

e. State and date of incorporation etc.

See 1.b. above.

f. N/A

2. Description of Site

See attached Jacques Whitford, Inc. (JWI) report, Appendix B. Note that the JWI Report was prepared by McLaren-Hart, Inc. who filed for Chapter 11 bankruptcy

Request for Information

protection on 6/26/00. The work involving the Carlstadt facilities' ISRA remediation initiated by McLaren-Hart has been taken over by JWI. Also note that the Ganes' Carlstadt facility property is not within the Berry's Creek Study Area.

3. Provide a narrative description of the nature of the companies business.

Manufacturer of Active Pharmaceutical Ingredients and Intermediates (APIs). Also, refer to JWI report, Appendix B.

4. Time periods for lease, own, and/or operated the site

Refer to JWI report, Appendix A.

5. Describe the site at the time the company took over the site.

Refer to JWI report, Appendices B-1 and B-2.

6. Describe the nature of the relationship between Ganes Chemical Works, Inc. and Siegfried (USA).

Incorporated in New York on 1/1/28 as Ganes Chemical Works, Inc. Ganes reincorporated on 5/23/89 in Delaware as Ganes Chemicals, Inc. On 1/1/02, Ganes changed its name to Siegfried (USA), Inc. Siegfried (USA), Inc. is a wholly owned subsidiary of Siegfried Ltd.

7. Describe in detail the nature of the activities conducted by the company at the site from the time the company began operations at the site until the present time, including:

- a. The services performed at the site,

Manufacturer of Active Pharmaceutical Ingredients and Intermediates (APIs). Also, refer to JWI report, Appendix B.

- b. All products which the company manufactured, supplied, or sold which resulted from activities at the site,

Refer to JWI report, Appendix C-1.

- c. Research and development activities, and

Refer to JWI report, Appendices B-1 (pages 3, 11, and 12 of 13), B-2 (page 3 of 11), C-1, C-2, E-3 (page 3 of 4), and E-6 (pages 5 and 6 of 69).

- d. The time period during which those activities occurred.

Request for Information

See Items 7.a., 7.b., and 7.c. above.

8. Did your company cease operations at the site? If so, when? Describe the circumstances that precipitated your company's decision to cease operations at the site.

Ganes sold Block 18 Lots 6 – 10 and Block 19 Lots 9 – 11 to NOVUS Fine Chemicals, L.L.C. as of 12/31/99.

Block 23 Lots 1 and 2 were sold to Carlstadt-Hoboken L.L.C. and Everest Equities, L.L.C. as of 2/15/02.

Block 2 Lot 8 has not been used since 12/31/99.

In 1999, management evaluated the company's operations regarding future capital investments necessary to conform all facilities with the company's current and anticipated future product portfolio. After comparing the Carlstadt facility, which had no opportunity for future expansion, with the Pennsville facility, a newer plant with adequate future expansion possibilities, management decided to sell the Carlstadt office and manufacturing facilities and invest all future capital only in the Pennsville facility.

9. Did your company generate hazardous wastes at the site, or does your company currently do so? Please describe your company's treatment, storage and/or disposal practices for any hazardous wastes generated the site.

Refer to JWI report, Appendices C-3 and C-4 and G. The active portion of the site is currently owned and operated by NOVUS Fine Chemicals, LLC.

10. Provide a list of all local, state and federal environmental permits ever granted for the site or any part thereof.

Refer to JWI report, Appendices D-2 and D-3. Additional lists of permits are also provided in attached Tables 1 and 2 with some duplication.

11. List all hazardous substances (as defined in the instructions), which were, or are, used, stored, or handled at the site.

Refer to JWI report, Appendices C-1, C-2, and C-3.

12. State when and where each substance identified in your response to Question 11 was, or is, used, stored, or handled at the site and the volume of each substance.

Refer to JWI report, Appendices B-1, B-2, C-1, C-2, C-3, and C-4.

Request for Information

13. Describe in detail how and where the hazardous wastes, industrial wastes, and hazardous substances generated, handled, treated, and stored at the site were, or are, disposed of. If any hazardous wastes, hazardous substances, or industrial wastes were, or are, taken off-site for disposal or treatment, state the names and addresses of the transporters and the disposal facility used.

Refer to JWI report, Appendices B-1, B-2, C-1, C-2, C-3, C-4, D-1, D-2, and D-3.

14. Who determined, or determines, where to treat, store, and /or dispose of the hazardous substances and/or hazardous wastes handled at the site? Provide the names and current or last known address of any entities or individuals which made such determination.

See the attached list of contacts with reference to waste disposal.

15. Describe in detail the remedial activities conducted at the site under CERCLA, RCRA, and/or laws of the state of New Jersey. Describe your company's involvement in the remedial activities.

Refer to JWI report, Appendices F-1 and G-1.

16. Identify all leaks, spill, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred, or are occurring, at or from the site. Specifically identify and address any leaks, spills, or releases to the Berry's Creek Study Area. Identify:

- a. When such releases occurred;

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

- b. How the releases occurred;

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

- c. The amount of each hazardous substance, pollutant, or contaminant so released (for substances contained in any sewage effluent from the site, provide discharge monitoring reports or other data indicating discharge concentrations and loads, as available);

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

Request for Information

- d. Where such releases occurred;

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

- e. Where such releases entered the Berry's Creek Study area, if applicable; and

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

- f. The pathway by which such releases entered the Berry's Creek Study Area, including any storm sewers, pipes, or other conveyances discharging to a water body or wetland; or via surface runoff, groundwater discharge, or any spills, leaks, or disposal activities.

Refer to JWI report, Appendices E, F-1, and G-1. Note that the Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

17. Please complete the form on page 5 below. Indicate on the form whether each of the chemicals listed has ever been released from the site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow all additional instructions on the form. In addition, please answer Question 16, above, specifically addressing any chemicals for which you answered "yes."

N/A. The Ganes site is not in the Berry's Creek Study Area and Ganes is not aware of any leaks, spills, or releases to the Berry's Creek Study Area.

18. Identify all companies, firms, facilities, and individuals (hereafter referred to as "customers") from whom your company obtained, or obtains, materials containing Industrial Waste as defined in Number 7 of the Definitions and whose Industrial Waste was, or is, treated, stored, handled or disposed of at the site. For each such customer:

- a. N/A. Ganes did not receive Industrial Waste.
- b. N/A. Ganes did not receive Industrial Waste.
- c. N/A. Ganes did not receive Industrial Waste.
- d. N/A. Ganes did not receive Industrial Waste.
- e. N/A. Ganes did not receive Industrial Waste.

19. For each customers' industrial wastes handled, treated, stored, or disposed of at the site describe:

Request for Information

N/A. Ganes did not receive Industrial Waste.

20. Please supply any additional information or documents that may be relevant or useful to identify other companies or sources that sent industrial wastes to the site.

N/A. Ganes did not receive Industrial Waste.

21. Please state the name title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information and correlate each individual to the question on which he or she was consulted.

(See the attached list of contacts.)

22. For each question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.

(See the attached list of documents.)

Table 1 - Carlstadt Facility Permit Status

PERMIT	MEDIA	DESCRIPTION	AGENCY	COMPLIANCE	TRANSFER ISSUES	REGS.	REQUIREMENTS	RESPONSIBILITY
Batch Plant Permit	Air	Permit to discharge air emissions from batch production	NJDEP	Annual emissions report, daily compliance inspections	Not transferable; new permit will have to be applied for	7:27-8.21	120 days after start of change	RMP - Filing new application
Pilot Plant Permit	Air	Permit to discharge air emissions from pilot plant	NJDEP	Quarterly emissions reports, pre and post emission certifications	Transferable if same equipment is used and permit conditions can be maintained	7:27-8.21	120 days after start of change	AK
Equipment Permits	Air	Permit to discharge air emissions from various plant equipment	NJDEP	Annual compliance issues	Transferable if equipment is not modified and permit conditions can be maintained	7:27-8.21	120 days after start of change	AK
Smoke Permit	Air	Permit to discharge air emissions from facility	Borough of Carlstadt	Annual renewal	New permit will have to be obtained	N/A	Annual renewal	AK
Wastewater Permit	Water	Permit to discharge industrial wastewater to sanitary sewer	Bergen County Utilities Authority	Monthly sampling and reporting; annual renewal	Transferable, however existing compliance issues may complicate issues	BCUA permit page 8	30 days advance notice	RMP
Physical Connection Permit	Water	Permit to ensure proper installation and operation of 3 backflow prevention devices	NJDEP	Quarterly inspections; annual renewal	Transferable, pending NJDEP approval	7:10-10.7	Notify NJDEP within 14 days of change	RMP
Water Allocation Permit	Water	Permit to divert water from 3 wells for production cooling needs	NJDEP	Monthly monitoring; quarterly report; annual renewal	Transferable, pending NJDEP approval	7:19-1.5	Purchaser shall submit a request for approval of transfer 30 days prior to purchase	AK
Stormwater Permit	Water	Permit to discharge stormwater from industrial activity to surface waters	NJDEP	Quarterly inspections; annual compliance certification	Transferable, pending NJDEP approval	7:14A-16.5	Submit written agreement by both parties w/date to NJDEP	RMP
Underground Storage Tanks	Other	Registration to operate 6 underground storage tanks	NJDEP	Maintain compliance requirements and financial coverage	Transferable, pending NJDEP approval	7:14B-2.4	Submit Certification questionnaire 30 days after completion of the modification	AK
Hazardous Waste ID No.	Haz. Waste	Federal registration to generate and manage hazardous waste	EPA	Maintain compliance requirements and financial coverage	Transferable		Ganes will have to deactivate existing number, new entity will have to apply to reactivate	RMP - Deactivate AK - Activate
Discharge Prevention, Containment and Countermeasure Plan	Other	Program to store, transfer, process, and use NJ defined hazardous substances	NJDEP	Maintain compliance requirements and financial coverage	Transferable, pending NJDEP approval	7:1E-4.8	Submit notice to NJDEP within 30 days of the change. New entity must have proper insurance	AK
FCC License	Other	License to use pagers, radios	FCC	Annual registration	Easily transferable		New entity will have to notify FCC in writing	AK
DOT Registration	Other	Registration to transport haz. materials	DOT	Annual registration	New registration will have to be filed		New entity will have to notify DOT in writing	AK

Table 2 - Carlstadt Facility Permit No's

PERMIT	MEDIA	AGENCY	PERMIT NO.	EFFECTIVE	EXPIRES	COMMENTS
Batch Plant Permit	Air	NJDEP	01-97-4427	6/24/1998	6/24/2003	
Pilot Plant Permit	Air	NJDEP	125353	4/1/1996	4/1/2001	
Equipment Permits						
Boiler: NJ Stack No. 12	Air	NJDEP	122988	6/28/1995	9/19/2001	
Boiler: NJ Stack No. 74	Air	NJDEP	118110	8/12/1994	10/29/2001	
UST: E5 (EtOH)	Air	NJDEP	01955856	1/12/1996	1/12/2001	
UST: E6 (IPA)	Air	NJDEP	01955855	1/12/1996	1/12/2001	
UST: E8 (Fuel Oil)	Air	NJDEP	077679	2/28/1987	2/28/1997	Renewal application filed 6/97 - No response to date
UST: E9 (Toluene)	Air	NJDEP	01972383	7/31/1997	7/31/2002	
UST: E10 (Acetic Anhydride)	Air	NJDEP	01955857	1/12/1996	1/12/2001	
AST: E13 (Acetic Acid)	Air	NJDEP	087536	10/24/1988	10/24/1998	Renewal application filed 12/97 - No response to date
AST: E15 (Various)	Air	NJDEP	01955858	1/18/1996	1/18/2001	
AST: E25 (Various)	Air	NJDEP	111179	2/24/1993	2/24/1998	Renewal application filed 12/97 - No response to date
AST: P6 (Rac-6 ML)	Air	NJDEP	01974309	3/24/1998	3/24/2003	
Neutralization tank	Air	NJDEP	122280	5/1/1995	5/15/2000	
Smoke Permit	Air	Carlstadt	319	6/30/1998	6/30/1999	Awaiting renewal notice
Wastewater Permit	Water	BCUA	99-0287	3/1/1999	2/29/2000	
Physical Connection Permit	Water	NJDEP	0900	4/1/1999	3/31/2000	
Water Allocation Permit	Water	NJDEP	2055P	4/16/1993	10/31/1998	Renewal application filed 9/98 - No response to date
Stormwater Permit	Water	NJDEP	NJ0104591	7/1/1995	6/30/1998	Renewal application filed 1/98 - No response to date
Underground Storage Tanks	Other	NJDEP	0059231	1/1/1999	12/31/2001	Registration of six tanks
Hazardous Waste ID No.	Haz. Waste	EPA	NJD001213727	1980?	N/A	
Discharge Prevention, Containment and Countermeasure Plan	Other	NJDEP	020500351001	1/26/1998	1/26/2001	
FCC License	Other	FCC	9411R04178	11/14/1994	8/30/1999	Renewal application filed
DOT Registration	Other	DOT	071498499328G	7/15/1998	6/30/1999	Lapsed 1999, renewal form submitted

Berry's Creek Study Area Requested Information
Contact List

Contact Name	Address/Phone No./ Company Affiliation	Request for Information Referenced Sections
Mr. Roman M. Pazdro Manager, ESH & Utilities	NOVUS Fine Chemicals 426 Orchard Street Carlstadt, NJ 07072 Phone: 201-635-1333 Fax: 201-635-1347	Sections 9 & 10.
Mr. Paul Michaels Supervising Environmental Scientist	Jacques Whitford Company, Inc. 450 South Gravers Road Suite 105 Plymouth Meeting, PA 19462 Phone: 484-322-0301 x106 Fax: 484-322-0302	All Sections
Mrs. Rita M. van Eck Human Resources Director	Siegfried (USA), Inc. 33 Industrial Park Road Pennsville, NJ 08070 Phone: 856-540-6293 Fax: 856-678-3143	Sections 1, 3, 5, 6, 7.a., and 8.
Mr. Thomas Strauss Chief Financial Officer	Siegfried (USA), Inc. 33 Industrial Park Road Pennsville, NJ 08070 Phone: 856-540-6340 Fax: 856-678-8206	Sections 1, 6, and 8.
Ms. Cecilia Guerrette Controller	Siegfried (USA), Inc. 33 Industrial Park Road Pennsville, NJ 08070 Phone: 856-540-6313 Fax: 856-678-8206	Sections 1, 6, and 8.
Mr. Victor J. Giudice ESH Manager	Siegfried (USA), Inc. 33 Industrial Park Road Pennsville, NJ 08070 Phone: 856-678-8836 Fax: 856-678-4008	All Sections
Mr. Tod W. Read Esquire	Bonner, Kiernan, Trebach, and Crociata 1250 Eye Street, NW Washington, DC 20005 Phone: 202-712-7000 Fax: 202-712-7100	All Sections

Berry's Creek Study Area Requested Information
Document List

Document Name	Document Prepared by and Date	Request for Information Referenced Sections
Preliminary Assessment Report with Remedial Investigation NJDEP Case No. E99826	Mr. Paul Michaels Jacques Whitford Company, Inc. 450 South Gravers Road Suite 105 Plymouth Meeting, PA 19462 Phone: 484-322-0301 x106 Fax: 484-322-0302 Prepared 4/18/2000	Sections 2-5, 7, 9-13, 15, and 16.
USGS Weehawken Quadrangle New Jersey – New York 7.5 Minute Series (Topographic)	U.S. Geographical Survey Reston, Virginia 22092 Photorevised 1981	Sections 2, 16 and 17.
Table 1 – Carlstadt Facility Permit Status	Mr. Roman Pazdro NOVUS Fine Chemicals, LLC. 426 Orchard Street Carlstadt, NJ 07072 Phone: 201-635-1333 Fax: 201-635-1347 Prepared 12/1999	Section 10.
Table 2 – Carlstadt Facility Permit No's	Mr. Roman Pazdro NOVUS Fine Chemicals, LLC. 426 Orchard Street Carlstadt, NJ 07072 Phone: 201-635-1333 Fax: 201-635-1347 Prepared 12/1999	Section 10.